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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS : 03-MDL-1570  
ON SEPTEMBER 11, 2001 : (GBD)(SN)

- - -

APRIL 6, 2021  
THIS TRANSCRIPT CONTAINS  
CONFIDENTIAL MATERIAL

- - -

Remote Videotaped  
Deposition, taken via Zoom, of CHAS W.  
FREEMAN, JR., commencing at 9:08 a.m., on  
the above date, before Amanda  
Maslynsky-Miller, Certified Realtime  
Reporter and Notary Public in and for the  
Commonwealth of Pennsylvania.

- - -

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1 today.

2 How would you like for me to  
3 refer to you during the deposition? I  
4 know -- is it Chas? Mr. Freeman? I  
5 understand you had a post as a U.S.  
6 Ambassador. Is Ambassador Freeman  
7 something you would be more comfortable  
8 with me calling you?

9 A. Ambassador Freeman would be  
10 fine.

11 Q. Ambassador Freeman, all  
12 right.

13 I understand you held a post  
14 as a U.S. Ambassador to the Kingdom of  
15 Saudi Arabia from 1989 to 1992, right?

16 A. Correct.

17 Q. And you have not held a post  
18 as a U.S. Ambassador for about 29 years  
19 or since 1992; is that right?

20 MR. HAEFELE: I'm sorry, I  
21 didn't hear the answer.

22 THE WITNESS: Yes.

23 BY MR. HAEFELE:

24 Q. But since you held that post

1           A.     They are documents I read  
2 after writing my report.

3           Q.     Okay. If you had to  
4 estimate the number of documents that you  
5 read in preparation for your deposition,  
6 what would that volume be?

7           A.     I really don't know. I  
8 mean, I don't count documents. I'm not  
9 testifying on the basis of documents.

10          Q.     Well, was it more than ten  
11 or less than ten?

12               MR. GOETZ: Objection.  
13 Form.

14               MR. HAEFELE: You can  
15 answer.

16               THE WITNESS: I really don't  
17 know.

18 BY MR. HAEFELE:

19          Q.     So it could have been less  
20 than ten?

21          A.     It could have been.

22          Q.     When counsel for WAMY sent  
23 along the report that's attributed to  
24 you, they also sent a document that was

1 highest degree of formal education you've  
2 obtained?

3 A. Yes.

4 Q. And at any time during your  
5 formal education in Mexico, New Haven or  
6 Cambridge, did you study Islamic  
7 religion?

8 A. No.

9 Q. Did you study Islamic  
10 charities?

11 A. No.

12 Q. Did you study charities at  
13 all?

14 A. No.

15 Q. Did you study the Arabic  
16 language in any of those places?

17 A. No.

18 Q. Did you study any Arabic  
19 studies in Mexico, New Haven or  
20 Cambridge?

21 A. No.

22 Q. Did you study any Saudi  
23 Arabian studies?

24 A. No.

1           Q.     When you were at those  
2     schools during your formal education, did  
3     you study any Saudi politics?

4           A.     No.

5           Q.     Any Middle East politics?

6           A.     No.

7           Q.     Any Saudi history at all?

8           A.     No.

9           Q.     Any Middle East history at  
10    all?

11          A.     No.

12          Q.     What, if any, specific  
13    formal education have you had related to  
14    the Kingdom of Saudi Arabia?

15          A.     Language training at the  
16    Foreign Service Institute, prior to  
17    becoming Ambassador; areas studies at the  
18    Foreign Service Institute, an academic  
19    program focused on the very issues you  
20    mentioned; and self-study every morning,  
21    before I went to work in Saudi Arabia, an  
22    hour of Arabic and related material.

23          Q.     And those were all related  
24    to the time period before and during the

1 time period you were -- held your post as  
2 Saudi Ambassador --

3 A. Yes.

4 Q. -- or Ambassador to Saudi  
5 Arabia from the U.S.?

6 A. Yes.

7 Q. Let me go back.

8 MR. HAEFELE: Jon, can you  
9 take away that marking on the  
10 educational section?

11 And let's highlight the  
12 middle section of the C.V., yeah,  
13 the dates. That's terrific.

14 BY MR. HAEFELE:

15 Q. You took a post from 1989 --  
16 from '89 to '92 as the U.S. Ambassador to  
17 the Kingdom of Saudi Arabia, right?

18 A. Yes.

19 Q. And before you took that  
20 post as Ambassador, you had no training  
21 regarding Saudi Arabia, other than the  
22 training for the post itself, correct?

23 A. That's right.

24 Q. I understand that you are

1 Foreign Service, but I was seconded to  
2 the Department of Defense.

3 Q. All right. So was your last  
4 post in the Foreign Service in 1992?

5 A. No. I remained in the  
6 Foreign Service while I was on active  
7 duty at the Defense Department.

8 Q. Okay. So then -- so you --  
9 what did you do between the 1992 period  
10 and the time period that you, in '93,  
11 when you became the assistant secretary  
12 of defense in international security  
13 affairs?

14 A. I wrote two books on  
15 diplomacy and state craft at the National  
16 Strategic Study Center at Fort McNair in  
17 Washington, D.C.

18 Q. Okay. And you ended your  
19 post as the assistant secretary of  
20 defense in 1994, correct?

21 A. Yes.

22 Q. All right. So from 1966 to  
23 1967, by far, during the years that you  
24 were there, from '66 to '94, most of your

1 postings related to East Asia, China,  
2 Taiwan or Bangkok, right?

3 A. Or India.

4 Q. Or India.

5 A. Actually, let me correct  
6 that. I was -- I think this probably --  
7 yes.

8 I held two positions in the  
9 now euthanized U.S. information agency;  
10 once in the U.S. information service in  
11 South India, '67 to '68, and again in  
12 1978 at the headquarters in Washington,  
13 D.C.

14 I also created the refugee  
15 function for the United States, organized  
16 it, and was the initial acting  
17 coordinator for refugee affairs in 1979.

18 Q. I'm missing how that  
19 changes -- were most of your postings in  
20 East Asia?

21 A. Overseas, yes.

22 Q. Where were you living or  
23 where were you located during your  
24 postings?



1 Q. Did you interact with WAMY,  
2 or any other Islamic charity, during your  
3 Foreign Service career from '65 to '94?

4 A. Yes. As Ambassador to Saudi  
5 Arabia, I did have a meeting with the  
6 World Muslim League, which I believe was  
7 reported in an earlier -- in the earlier  
8 document referred to.

9 Q. Which document was that?

10 A. The document I wrote on  
11 sovereign immunity.

12 Q. So in the declaration that  
13 you wrote earlier in this litigation, you  
14 recall reporting the meeting that you had  
15 with -- is it Muslim World League,  
16 correct?

17 A. World Muslim League, yes.

18 Q. And your recollection is the  
19 entity is World Muslim League?

20 A. I'm sorry?

21 Q. Your recollection is the  
22 entity is World Muslim League?

23 A. Yes.

24 Q. All right. I will try --

1 business, which I still chair, which is a  
2 global business development firm.

3 Q. All right. You mentioned  
4 two books that you authored.

5 What are the two books?

6 A. One is called Arts of Power;  
7 State Craft and Diplomacy.

8 Q. And the other?

9 A. The other is called The  
10 Diplomats' Dictionary.

11 Q. And when did the Arts of  
12 Power come out? When was it published?

13 A. I think it probably came out  
14 around 1997.

15 Q. All right. And when did The  
16 Diplomats' Dictionary get published?

17 A. About the same time. It was  
18 originally the footnotes for the Arts of  
19 Power.

20 Q. And are those the only two  
21 books that you've published?

22 A. No. I have written two  
23 books on the American involvement in the  
24 Middle East and one on the American

1 involvement with China.

2 Q. When did the American  
3 involvement in the Middle East book come  
4 out?

5 A. Well, the first one -- I  
6 might have to go look. Just a minute.  
7 Let me -- I guess I can't really leave  
8 the screen.

9 Sometime in the early --  
10 early part of the century. It was  
11 followed in the -- in the second decade  
12 of the century by a follow-on book.

13 The first book is called  
14 America's Misadventures in the Middle  
15 East. The second book, not surprisingly,  
16 was called America's Continuing  
17 Misadventures in the Middle East.

18 Q. Do any of -- do either of  
19 those books cover the issue of Saudi  
20 charities in the Middle East?

21 A. Not specifically.

22 Q. And I take it the book on  
23 the American involvement in China does  
24 not do that either, correct?

1           A.     So those are the focuses.

2           Q.     When you say "those are the  
3 focuses" -- I should add other than  
4 rebutting some of the testimony of some  
5 of the plaintiffs' experts, are there any  
6 other subject areas that you have been  
7 called upon to offer your own opinions  
8 about?

9           A.     I've offered my own opinions  
10 in the report, and they stand as they  
11 are.

12          Q.     And that's what I'm asking  
13 you.

14                   At the outset of your  
15 report, you have identified what WAMY has  
16 asked you to opine about.

17                   And that is in this  
18 paragraph, correct?

19          A.     Yes.

20          Q.     And did you answer any  
21 other -- or offer opinions in any other  
22 areas other than what you were asked to  
23 opine on by WAMY?

24          A.     Not really.

1 The areas that you've outlined in your  
2 report, correct?

3 A. I -- yeah, sure.

4 Q. Have you been asked to  
5 testify to connections between WAMY  
6 officials and individuals associated with  
7 any terrorist entity, including Al Qaeda?

8 A. No.

9 Q. Have you been asked to  
10 testify with regard to the functions,  
11 regulations or internal structure of  
12 WAMY?

13 A. No.

14 Q. How about of any Islamic  
15 charity other than WAMY?

16 A. No.

17 Q. And so you haven't opined on  
18 any of those issues, correct?

19 A. That's correct.

20 Q. Have you been asked to  
21 testify as to whether any Saudi-sponsored  
22 charity has been giving -- has given  
23 material support to Al Qaeda or any  
24 terrorist organization or any individual

1 delegating responsibility to many people  
2 for looking at many questions, including  
3 these questions.

4 My personal involvement,  
5 however, is as stated, a single meeting  
6 with the World Muslim League.

7 Q. Have you opined at all as to  
8 whether any Saudi-sponsored charity has  
9 given material support to Al Qaeda?

10 MR. NASSAR: Objection to  
11 form.

12 THE WITNESS: Yes. Yes, I  
13 have offered opinions on that.

14 BY MR. HAEFELE:

15 Q. In your report?

16 A. Yes.

17 Q. Where in your report is that  
18 opinion?

19 A. It is throughout the report.  
20 It is the nature of Saudi charities  
21 organized by the government, including  
22 WAMY, about which I am speaking, to  
23 represent the interest of the Kingdom of  
24 Saudi Arabia in the religious sphere.

1                   They train young people in  
2   Saudi Arabia and they train people  
3   outside of Saudi Arabia. They also  
4   provide charitable relief to people  
5   outside Saudi Arabia.

6                   My involvement with such  
7   organizations began long before I went to  
8   Saudi Arabia. As the chargé d'affaires  
9   and the deputy chief commission at the  
10   American embassy in Beijing, I had at my  
11   disposal an annual amount of roughly \$600  
12   million to disburse for the purchase of  
13   Chinese weaponry for the Mujahideen in  
14   Afghanistan.

15                  I was very familiar with the  
16   U.S. cooperation with Saudi Arabia, with  
17   China, with Pakistan, with Egypt and  
18   other actors in resisting the Soviet  
19   occupation and in providing relief to  
20   refugees.

21                  So, yes, I know a lot about  
22   that. I did not personally engage in --  
23   with Saudi charities in Saudi Arabia as  
24   Ambassador.

1           A.     I don't know the specific  
2     date. But it was in 1992, I believe.

3           Q.     Okay. And that's based on  
4     your experience and your expertise as  
5     a -- somebody in that field?

6                     MR. GOETZ: Objection.

7           Form.

8     BY MR. HAEFELE:

9           Q.     Or is it based on some  
10    documents that you've seen or --

11          A.     There is no -- I am not  
12    testifying on the basis of documents.  
13    The information on when Al Qaeda was  
14    founded is readily available in the 9/11  
15    Commission report.

16          Q.     Okay. So is your testimony  
17    that, you know, you recall it being in  
18    the 1992 time period something that  
19    you're basing on your having read the  
20    9/11 Commission report?

21          A.     No. I was hearing it at the  
22    time.

23          Q.     You're recalling it --  
24    you're recalling it based on your



1     prepare for the deposition?

2             A.     For today's event, yes.

3             Q.     Can you approximate the  
4     volume for me?

5             A.     Pardon me?

6             Q.     Can you approximate the  
7     volume, the number of documents?

8             A.     I don't know, a dozen,  
9     maybe.

10            Q.     Can you tell me what they  
11     are?

12            A.     A couple of intelligence  
13     reports; a telegram that your -- you have  
14     placed in evidence; the 9/11 report,  
15     which I reread; a couple of reports on  
16     the Saudi financial system.

17                   Well, that isn't the dozen.  
18     But that's pretty much what I remember.

19            Q.     Any documents that are  
20     internal to any of the charities, WAMY,  
21     Muslim World League, IIRO?

22            A.     No.   Some of the material  
23     that you had produced, which was  
24     basically invoices, that's all.

1 hours. It was a lot of documents. So --

2 Q. Did -- go ahead. I don't  
3 mean to interrupt.

4 A. No. So to the extent that  
5 those documents included internal papers  
6 from various charities, I read them.

7 Q. Well, did they include any  
8 internal documents?

9 In the documents that you  
10 listed that you read from the plaintiffs,  
11 you didn't include any internal documents  
12 of WAMY or Al-Haramain or IIRO.

13 And I'm asking you, did you  
14 review any of those?

15 A. I looked at everything that  
16 was provided. It was a long time ago.

17 Q. Were any internal documents  
18 on any of the charities, anything among  
19 the documents that you reviewed and  
20 relied upon for your opinions in the  
21 case?

22 A. Well, no. I was very struck  
23 by the total absence of specific  
24 references, particularly to WAMY, in the

1 documents. General statements --

2 Q. Well, did you --

3 A. -- that were tied to WAMY,  
4 but there is no causal connection and no  
5 specific evidence provided.

6 Q. Did you ask to review any of  
7 those documents?

8 A. I reviewed what I was given.

9 Q. All right. So if you  
10 weren't provided it, you obviously  
11 couldn't have reviewed it, correct?

12 A. Obviously.

13 Q. And did you ask for any more  
14 information about any internal documents  
15 related to WAMY?

16 A. No. I mean, I reviewed  
17 everything that was provided.

18 Q. Have you asked for anything  
19 about any investigations into the  
20 internal controls of WAMY?

21 A. I am -- no, I have not.

22 Q. All right. And have you  
23 asked for any information about how the  
24 finances of WAMY were distributed within

1 WAMY?

2 A. There are documents that  
3 refer to the mechanisms. I am generally  
4 familiar with how government-operated --  
5 government-organized nongovernmental  
6 organizations work in Saudi Arabia. Not  
7 specifically with WAMY.

8 Q. Did you review any documents  
9 regarding any of the auditing procedures  
10 of WAMY?

11 A. I believe some of the  
12 documents that were provided by the  
13 plaintiffs' counsel did include such  
14 discussion.

15 Q. And did you review anything  
16 other than those --

17 A. No.

18 Q. -- on auditing?

19 A. No.

20 Q. Is that a no?

21 Did you ask for anything  
22 about auditing other than what was  
23 provided to you?

24 A. No.

1           Q.     Did you review any documents  
2     about any auditing for any other charity  
3     other than WAMY?

4           A.     No, I don't believe I did.

5           Q.     All right. Just so we're  
6     clear, did you get any documents from any  
7     charity other than WAMY?

8           A.     Is the question for Fred?

9           Q.     Did you receive any internal  
10    documents for any charity other than  
11    WAMY?

12          A.     No.

13          Q.     So you've not seen any  
14    documents whatsoever related to Muslim  
15    World League, or World Muslim League, or  
16    IIRO, or International Islamic Relief  
17    Organization, right?

18          A.     I repeat. My testimony is  
19    not based on documents.

20          Q.     And you have not seen any  
21    documents related to any charity other  
22    than some documents that you received,  
23    through WAMY's counsel, related to WAMY  
24    that came from plaintiffs' counsel; is

1 any Saudi entity.

2 Q. Have you ever worked --  
3 withdraw that.

4 What is your knowledge of  
5 WAMY's structure?

6 A. General.

7 Q. Where did it come from?

8 A. I'm not able to distinguish  
9 WAMY from other GONGOS,  
10 government-organized non-governmental  
11 organizations.

12 Q. And I assume the same would  
13 be the case for any of the other  
14 charities, correct?

15 A. Yes.

16 Q. What WAMY offices, if any,  
17 have you visited?

18 A. I have never visited a WAMY  
19 office.

20 Q. What WAMY officials, if any,  
21 have you ever spoken to?

22 A. I have never spoken to a  
23 WAMY official.

24 Q. Are you familiar with any of

1 to organizations like MS, which the  
2 Saudis regarded as an enemy.

3 Q. Do you have any knowledge of  
4 any of the controls, audits and security  
5 measures WAMY used during -- during the  
6 time period since you were an Ambassador?

7 A. No.

8 Q. Do you have any knowledge  
9 about the accounting systems or  
10 methodology that WAMY has used?

11 A. No.

12 Q. Do you have any personal  
13 knowledge of how WAMY identified projects  
14 that were to be funded or activities that  
15 were to be undertaken?

16 A. No.

17 Q. Have you been asked to offer  
18 an expert opinion on funding received by  
19 WAMY for the Kingdom -- or from the  
20 Kingdom?

21 A. Asked by whom?

22 Q. The counsel for WAMY.

23 A. No.

24 Q. Have you been asked by the

1 counsel for WAMY to offer an expert  
2 opinion about audits that may or may not  
3 have been performed by WAMY throughout  
4 WAMY's history?

5 A. No. No such question has  
6 been put to me.

7 Q. And have you been asked to  
8 offer an expert opinion about specific  
9 projects funded by WAMY?

10 A. Not -- with the possible  
11 exception of support for resistance to  
12 genocide in Bosnia, no.

13 Q. Have you been asked to offer  
14 an expert opinion about terrorist  
15 training camps purportedly funded by WAMY  
16 or other Saudi charities?

17 MR. GOETZ: Object to the  
18 form of the question.

19 THE WITNESS: I don't  
20 believe there are any such  
21 training centers. And I have not  
22 been asked about them.

23 BY MR. HAEFELE:

24 Q. Have you been asked to offer



1 of your government positions, let's say  
2 in 1994 -- was it 1994?

3 When you left the government  
4 in 1994, did you continue to have the  
5 treasury attaché as one of your sources  
6 of information?

7 A. I used to see him initially  
8 when I would return to the Kingdom. But  
9 I have always followed a rule that if you  
10 leave a position of authority, you should  
11 leave it and not look over your  
12 successor's shoulder. And so I did not  
13 interfere with my successor.

14 But the treasury attaché in  
15 question, who worked for me, was a very  
16 competent individual. And I benefitted  
17 greatly from his counsel.

18 Q. Well, my real question is,  
19 the tremendous amount of resources you  
20 had as the Ambassador, when you left your  
21 position in the government, you also left  
22 behind the sources of information such as  
23 the Treasury, Defense Department,  
24 political section of the embassy,

1 economic section of the embassy and the  
2 CIA station; you no longer had those  
3 resources available to you, correct?

4 A. I spoke frequently with all  
5 of those people in a private --

6 Q. Were they giving -- I'm  
7 sorry, I didn't --

8 A. They were not under  
9 obligation to me, if that's what you're  
10 asking.

11 Q. They had no obligation and  
12 they were not providing you with the  
13 information in the way they were  
14 providing it to you while you were the  
15 Ambassador, were they?

16 A. No, they were not.

17 Q. And when you left your  
18 position in the United States government  
19 in 1994, did you have any interactions  
20 with any charitable entities from the  
21 Kingdom of Saudi Arabia since then up  
22 until you were asked to write the report  
23 for WAMY?

24 A. No.

1           Q.     And you had no familiarity  
2     with any of the charities' ongoings,  
3     their finances, their innerworkings at  
4     all from that time period, correct?

5           A.     More or less correct. I  
6     mean, I was in a dialogue with people in  
7     the American embassy who had the habit of  
8     telling me a lot of things.

9                     But I was not --

10          Q.     What kind of -- what kind of  
11     "a lot of things" were they telling you?

12          A.     A lot of information about  
13     what was happening in the Kingdom, what  
14     was of concern to their agency in  
15     Washington, what their differences were  
16     with the judgements of Washington,  
17     which --

18          Q.     Tell me specifically, out of  
19     those discussions that you had, what  
20     specifically related to Saudi charities?

21          A.     I had a discussion with John  
22     Brennan, who was then the station chief,  
23     later the director of CIA, which touched,  
24     in part, on that.

1 BY MR. MALONEY:

2 Q. We left off just a second  
3 ago about -- talking about the Binladin  
4 family.

5 Have you ever met Osama bin  
6 Laden?

7 A. Never.

8 Q. Before I get to your report,  
9 I have some questions about it. I just  
10 want to clarify something.

11 Are you holding yourself out  
12 to be an expert in terror financing?

13 A. No.

14 Q. And are you holding yourself  
15 out to be -- I know you said you had some  
16 general knowledge about Saudi charities,  
17 we've covered some of that throughout the  
18 day.

19 But do you consider yourself  
20 an expert in Saudi charities?

21 A. No, not per se.

22 Q. And do you consider yourself  
23 an expert in WAMY, the charity WAMY?

24 A. No.

1           Q.     And the methodology you used  
2 here to render your expert report was  
3 based primarily on your personal  
4 experience and knowledge having been an  
5 Ambassador in the Kingdom?

6           A.     My professional experience  
7 dealing with this and related issues,  
8 both in Saudi Arabia and in prior  
9 incarnations, one of which I mentioned.

10          Q.     And to the extent that you  
11 relied on any documents for your opinion,  
12 they are listed in your report, I take  
13 it; is that fair?

14          A.     I did not rely on documents.

15          Q.     Okay. We talked about the  
16 time when you were an Ambassador and some  
17 issues came up with regard to the Muslim  
18 World League, a Saudi charity.

19                     And I think you met with Mr.  
20 Naseef in Jeddah to discuss with him some  
21 issues regarding the diversion of funds  
22 to support a terror group that came out  
23 of a mosque in Birmingham, something to  
24 that effect.

1     cited that article. But I do remember  
2     the event.

3             Q.     Just to be clear, Al Qaeda  
4     is a Sunni terror organization, not Shia,  
5     correct?

6             A.     Yes.

7             Q.     You mentioned in your  
8     report, I think at the endnote on Page 12  
9     and 13, about the origin of the majority  
10    of the Saudi hijackers for 9/11.

11            A.     Yes.

12            Q.     And what information do you  
13    have about the origin of those Saudi  
14    hijackers that you're referring to in  
15    your endnote?

16            A.     Well, this is not my  
17    endnote. This is a quotation from an  
18    intelligence officer, retired.

19                   And the fact is that the  
20    region of Saudi Arabia from which the  
21    majority of the hijackers came was  
22    originally Zaydi, meaning another Shia  
23    sect, that was conquered by the Saudi  
24    monarchy in the 1930s. And the monarchy,

1           probably a long -- it's probably  
2           near the end, I think.

3           Keep going. Just scroll  
4           down to the next page, please.  
5           Next page, please. Next page.

6           That's it. Sorry. If you  
7           go back, you can see the bottom,  
8           there is Tidewater? Right there.

9           THE WITNESS: Yeah, that's  
10          the comment that I quoted.

11 BY MR. MALONEY:

12          Q.     So you quoted a blogger who  
13          was commenting on Colonel Patrick Lang's  
14          posting, correct?

15          A.     Yes.

16          Q.     And it looks like you lifted  
17          this entire quote from Tidewater and put  
18          it into your report; is that right?

19          A.     Yes. Because it rang  
20          absolutely true.

21          Q.     Do you know who Tidewater  
22          is?

23          A.     No idea.

24          Q.     So you're relying on an

1     number who came from this southwestern  
2     region of the Kingdom.

3             Q.     Why didn't you cite that as  
4     the reference to support your statement  
5     rather than this anonymous blogger?

6             A.     This is a very detailed and,  
7     in my view, accurate account of the  
8     reality.

9                     I didn't see any reason that  
10    I had to rewrite something that someone  
11    else had already done.

12            Q.     I'm just -- I'm just asking  
13    you really more of a methodology, in your  
14    training, background, education at Yale  
15    and Harvard and your affiliation with  
16    Brown on doing research and citing, for  
17    support, statements that are reliable.

18                     And an anonymous blogger  
19    doesn't strike me as somebody that you  
20    can rely on.

21                     Are you saying that you're  
22    perfectly willing to rely on an anonymous  
23    blogger?

24            A.     If the information the



1 blogger has written coincides with my own  
2 personal knowledge, yes.

3 Q. Okay. Are you aware that  
4 this blogger is also a conspiracy  
5 theorist on the World Trade Center Number  
6 7 theory?

7 Do you know what that is?

8 A. No. I know about that  
9 conspiracy theory. But I'm not aware of  
10 a connection.

11 Q. What is your -- what is your  
12 knowledge about that conspiracy theory  
13 just generally?

14 A. That there is a theory that  
15 on the one hand the two towers were  
16 brought down with pre-planted charges,  
17 and that this additional building  
18 adjacent to them was brought down in the  
19 same way.

20 Q. And is that a theory that  
21 you agree with or you espouse?

22 A. No.

23 MR. MALONEY: If I can ask  
24 Jon to scroll down a little bit to

1           the end of this blog. If you can  
2           highlight, Jon, go above the blue  
3           where it says, Tidewater. The  
4           last line of his blog, if you can  
5           highlight that, please. It says,  
6           And who knows.

7 BY MR. MALONEY:

8           Q.     So the Tidewater blogger  
9           says, And who knows, maybe some new  
10          information about the WTC will be  
11          released.

12                   A reference to that  
13          conspiracy theory.

14                   Do you see that?

15          A.     Yes.

16          Q.     So this blogger seems to be  
17          implying that he believes in the  
18          conspiracy -- the World Trade Center  
19          Number 7 conspiracy theory.

20                   Do you see that, sir?

21          A.     I think that is expressing a  
22          suspicion that there might be something  
23          to the theory. I don't think it's  
24          endorsing it.

1           Q.     Ambassador Freeman, I just  
2     have a few closing questions.   And Mr.  
3     Maloney is done with you for the day.

4                     You -- and I'll just remind  
5     you you're still under oath.

6                     You wrote your report and  
7     then you sought information to confirm  
8     what you wrote; is that the way you  
9     approached how you wrote your report?

10           A.     Not exactly.   I wrote the  
11    report and then I looked for references  
12    that would corroborate what I knew.   That  
13    is correct.

14           Q.     All right.   And did you even  
15    consider any references to information  
16    that didn't corroborate what you wrote?

17           A.     Of course.   In the course of  
18    doing the research, looking for the  
19    corroboration, I came across all sorts of  
20    opinions.   I did not find any effectively  
21    refuting my views.

22           Q.     You spoke about the event at  
23    the Birmingham mosque.

24                     Do you remember what year it

1 about the blogger Tidewater?

2 A. Nothing.

3 Q. Did you ever speak to  
4 Tidewater?

5 A. Nope.

6 Q. And when you cite the  
7 Tidewater in Footnote 7 of your report,  
8 you say -- you describe Tidewater as a  
9 former U.S. intelligence officer who  
10 wishes to remain anonymous.

11 How do you know he was a  
12 former U.S. intelligence officer?

13 A. I think I asked the operator  
14 of the blog, Sic Semper Tyrannis, retired  
15 Colonel Lang, if he would identify the  
16 person who wrote such a thorough and, in  
17 my view, accurate description of the  
18 origin of the hijackers and was told that  
19 he wished to remain anonymous.

20 Q. Well, how do you know he was  
21 a former U.S. intelligence officer?

22 A. Because I trust Colonel  
23 Lang.

24 Q. So you've never actually

1 spoken to Tidewater at all?

2 A. No.

3 Q. And you don't, in fact, know  
4 that he's a former U.S. intelligence  
5 officer, correct?

6 A. I have the assurance of  
7 somebody I trust that he is.

8 Q. All right. And the only way  
9 that you know that he preferred to remain  
10 anonymous is because this Mr. Lang -- is  
11 it Colonel Lang -- told you that he was  
12 U.S. intelligence or a former U.S.  
13 intelligence officer who didn't want  
14 anybody to know who he was?

15 A. I asked Colonel Lang, as I  
16 recall, whether I could identify him.  
17 And that was the reply I got.

18 Q. So you don't, in fact, know,  
19 other than by secondhand information, who  
20 he is; and you don't, in fact, know,  
21 other than secondhand information, that  
22 he wants to remain anonymous; is that a  
23 fair characterization?

24 A. I've accepted the assurance

1 of someone on both points. I have no  
2 direct knowledge of that, no.

3 Q. By taking information off of  
4 the Internet from a source that you've  
5 never spoken to, someone that you only  
6 know who they are through secondhand  
7 information, and taking secondhand  
8 information and not being allowed to  
9 speak to the source, based on a refusal  
10 by the person that runs the blog, that's  
11 what you're basing your information on to  
12 be able to cite to him as a former U.S.  
13 intelligence officer?

14 MR. GOETZ: Objection.

15 Form.

16 THE WITNESS: No. The  
17 reason this caught my eye was that  
18 it coincided with everything that  
19 I personally knew, on the basis of  
20 looking at the names of the  
21 hijackers, the description of  
22 them, their whereabouts, and what  
23 I knew about that particular  
24 region of Saudi Arabia, which I

1 quick questions.

2 Do you know, who is Mohamed  
3 Abu Zubaydah?

4 A. Abu Zubaydah, yes, I think I  
5 do.

6 Q. Who is Abu Zubaydah?

7 A. I believe he's an Al Qaeda  
8 official.

9 Q. All right. And what do you  
10 know about Abu Zubaydah?

11 A. Nothing beyond that.

12 Q. All right. And who is  
13 Sheikh Mohamed al Hawashi?

14 A. I have no idea.

15 Q. All right.

16 MR. HAEFELE: And can we  
17 pull up Exhibit-559, please? And  
18 scroll to Page 5, please.

19 BY MR. HAEFELE:

20 Q. And in this quote from  
21 Tidewater that you quoted in your report,  
22 which you've attested to its accuracy,  
23 Tidewater says that, Abu Zubaydah was an  
24 al Farouq camp training -- he was at the

1 al Farouq camp training newcomers.

2 It's toward the bottom, last  
3 paragraph.

4 A. Right. Right.

5 Q. All right. If you didn't  
6 know who Abu Zubaydah was, other than he  
7 was in Al Qaeda, how were you able to  
8 attest to the accuracy of that statement  
9 in that quote?

10 A. The important statement is  
11 that this was essentially a con operation  
12 in which people recruited to go to  
13 Chechnya or Bosnia to resist genocide, or  
14 the Philippines where there's been  
15 several hundred years of conflict between  
16 the government and Muslims, and they were  
17 duped. And they went --

18 Q. So you don't actually  
19 know -- you don't actually know the  
20 details of this -- of what is in this  
21 Tidewater post, correct?

22 You're not able to confirm  
23 the details of what's in the post,  
24 correct?



1           A.     I'm able to confirm -- I am  
2     able to confirm that the statement that  
3     people were recruited under false  
4     pretenses is correct.

5           Q.     Isn't it more accurate to  
6     say that the post is confirmatory of your  
7     statements?

8                     You cited to it because it  
9     confirms what you said, right?

10          A.     Yes.

11          Q.     And Abu Zubaydah --  
12     Tidewater says Abu Zubaydah was perhaps  
13     Number 3 Al Qaeda.

14                     Do you know that to be true?

15          A.     I don't know his position.

16          Q.     Do you know that he was Al  
17     Qaeda?

18          A.     Yes. I already testified  
19     that I had that impression.

20          Q.     How do you -- how do you  
21     know Abu Zubaydah was Al Qaeda?

22          A.     There's been extensive  
23     reporting in the press. But, again, I  
24     did not cite this paragraph to talk about

1 Abu Zubaydah.

2 Q. Do you know who Frank  
3 McCullough is?

4 A. I don't think so.

5 Q. No? That name is not  
6 familiar to you.

7 MR. HAEFELE: I'm going to  
8 end here. I think Mr. Maloney has  
9 a few.

10 - - -

11 EXAMINATION

12 - - -

13 BY MR. MALONEY:

14 Q. Thank you. I'll try to go  
15 as quickly as I can. Hopefully, just  
16 five minutes.

17 Ambassador, you said when  
18 you were leaving Saudi Arabia from your  
19 embassy post, one of the last things you  
20 did was to send a letter to the U.S.  
21 government, I don't know who, but warning  
22 them about the rise of anti-American  
23 sentiment in Saudi Arabia based on the  
24 fact that U.S. troops were still there

1           Q.     The U.S. intelligence  
2     report?

3           A.     Yes.

4           Q.     And do you concur with its  
5     findings and conclusions, to the best of  
6     your knowledge?

7           A.     Yes, it seems to me to be  
8     entirely reasonable.

9           Q.     And so accepting, you have  
10    to essentially agree and believe that  
11    Crown Prince Mohamed bin Salman lied to  
12    the world when he said he didn't know  
13    anything about the murder of Khashoggi,  
14    true?

15          A.     Yes.

16                 MR. MALONEY:  I have nothing  
17    further.  Thank you.

18                 MR. GOETZ:  All right.  
19    That's it.

20                 VIDEO TECHNICIAN:  This ends  
21    today's deposition.  We are going  
22    to go off the record at 8:42 p.m.

23                         -   -   -

24                         (Whereupon, the deposition

1 concluded at 8:42 p.m.)

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CERTIFICATE

I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, CHAS W. FREEMAN, JR., was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

---

Amanda Miller  
Certified Realtime Reporter  
Dated: April 18, 2021

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